LITIGATION HOLD NOTICE

September 29, 2022

Vertol Systems, Inc.
℅ James L. Montgomerie, CEO
1001 Airport Road
Hangar 17-101
Destin, Florida 32541

25 NW 23rd Place Suite 261
Portland, Oregon 97210

Re: *Alianza Americas, et al. v. Ronald DeSantis, et al.*, Case No. 1:22-cv-11550 (D. Mass.)

Dear Mr. Montgomerie:

As you may know, Alianza Americas, and three "Doe" individuals, on behalf of themselves and all others similarly situated (together, the "Plaintiffs"), brought the above-referenced lawsuit (the "Action") against Ronald DeSantis, Governor of Florida, in his official and personal capacities; Jared W. Perdue, Secretary of the Florida Department of Transportation, in his official and personal capacities; the State of Florida; the Florida Department of Transportation; and Does #1-5 (together, the "Defendants"). This Action arises out of the Defendants' acts of fraud and deception in soliciting and ultimately transporting migrants from Texas to Martha's Vineyard, Massachusetts under false pretenses. Lawyers for Civil Rights represents the Plaintiffs in this Action. A copy of the Complaint is enclosed for your reference.

Generally speaking, in the Complaint, the Plaintiffs allege that in or around September 2022, the Defendants designed and executed a premeditated, fraudulent, and illegal scheme centered on exploiting the vulnerability of recent immigrants to the United States, for the purpose of advancing the Defendants' own personal, financial, and political interests. The Complaint alleges that in 2022, Defendant Doe #1, an as-yet unnamed individual, targeted many of the putative class members outside of a migrant shelter/resource center in San Antonio, Texas to induce them onto the flights to Martha's Vineyard. The Complaint further alleges that Defendant Doe #1 and others made false promises to the putative class members to induce them to travel, including of employment, housing, educational opportunities, and other like assistance. In reality, Defendants had arranged for no such services or notified anyone at the destination of the immigrants' impending arrival. After the putative class members were transported to Martha's Vineyard under false pretenses and left stranded there, Gov. DeSantis claimed credit for this scheme.

By this letter, we are formally placing you on notice of the Action and informing you that you are likely to have materials relevant to the issues in this Action, and that the Plaintiffs may seek such materials from you pursuant to Federal Rules of Civil Procedure 34(c) and 45. Accordingly, we request that you preserve immediately any and all documents, electronically stored information, and tangible things, stored in any medium, including but not limited to emails, video or audio footage, phone logs, visitor logs, payment records, manifests, text messages, and social media posts, that are or may potentially be relevant to the facts and claims alleged in the Action.

Documentation to be preserved includes, but is not limited to, any information relating to:

● the flight of immigrants from San Antonio to Martha's Vineyard on September 14, 2022, including flight logs, passenger logs, and any communications with Defendants or anyone else about the flight either before or after it occurred;
● any other flights of immigrants, whether executed or not, including flight logs, passenger logs, and any communications with Defendants or anyone else about the flights either before or after they occurred;
● any contracts with the State of Florida for any such transportation and any communications about any such contracts either before or after their execution; and
● any payments received or expected for any such contracted services.

Please be advised that spoliation of relevant evidence can result in sanctions and other penalties under Federal Rule of Civil Procedure 45(g).

We are available by phone or email to discuss any questions relating to this letter.

/s/ Oren Sellstrom
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Enclosure